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Before the
FEDERAL COMMUNICATIONS COMMISSION
 Washington, DC 20554

FEDERAL COMMUNICATIONS COMMISSION
 OFFICE OF THE SECRETARY

In the Matter of)

)
Revision of the Commission's Rules To)
Ensure Compatibility with Enhanced)
911 Emergency Calling Systems)
)

CC Docket No. 94-102**To: Wireless Telecommunications Bureau**

SUPPLEMENT TO REQUEST FOR LIMITED WAIVER
OF SECTION 20.18(d) OF THE COMMISSION'S RULES

STPCS Joint Venture, LLC, d/b/a SOL Communications ("STPCS"), by its attorneys, hereby supplements its request for a limited waiver of Section 20.18(d) of the Commission's rules regarding Phase I deployment of enhanced 911 ("E-911") service, filed with the Commission on November 3, 2000 (the "Waiver Request"). The purpose of this supplement is to inform the Commission of recent events related to STPCS's E-911 implementation efforts, and to extend the period for which STPCS seeks a waiver in order to implement Phase I E-911 service in the seven rural markets in south Texas for which STPCS holds licenses to provide personal communications services.

On January 26, 2000, the Texas Commission on State Emergency Communications ("TX-CSEC") requested, pursuant to Section 20.18(d), that STPCS implement Phase I E-911 service. STPCS immediately began the process of complying with the TX-CSEC's request. In its Waiver Request, STPCS described the difficulties it experienced between January 26, 2000 and November 3, 2000 in attempting to implement Phase I E-911 service. The primary reason for the delay has been the difficulty of negotiating with and coordinating the efforts of all of the

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parties who are indispensable to making implementation a reality. In STPCS's markets, these parties include the TX-CSEC; the 911 call data manager, SCC Communications Corporation ("SCC"), which also is the exclusive vendor for creating and servicing E-911 infrastructure in Texas; the local Texas Councils of Government; STPCS's equipment vendor (Nokia); and Southwestern Bell, the incumbent local exchange carrier ("ILEC").

At the time it filed its Waiver Request, STPCS was awaiting final approval of its Phase I exhibits by the local Councils of Government. STPCS also was awaiting the provisioning of additional trunks by Southwestern Bell. Upon final trunk delivery, STPCS intended to initiate testing of all circuits for Phase I E-911 compatibility and, upon completion of successful testing, to implement Phase I service. As it stated in the Waiver Request, STPCS believed that these steps could be completed by December 15, 2000.

Since November 3, the Councils of Government have approved STPCS's final Phase I exhibits, and Southwestern Bell completed delivery of STPCS's trunk orders. Unfortunately, however, problems with the delivered trunks will make implementation by December 15, 2000 impossible. It also appears that Public Safety Answering Point ("PSAP") equipment is not fully capable of supporting Phase I service.

Trunk Readiness. STPCS ordered enhanced multi-frequency ("EMF") trunks from Southwestern Bell. These trunks must be capable of transmitting 20 digits as a component of the CAS solution that STPCS must deploy in light of TX-CSEC requirements and the capabilities of STPCS's Nokia facilities. On November, 29, 2000, during a telephone conference to discuss the problem, STPCS learned that despite prior reassurances to the contrary, the Southwestern Bell tandem switches are not, in fact, capable of receiving 20 digits from EMF trunking. Immediate efforts to resolve the situation were undertaken but were delayed by a lack of readily available

information from Southwestern Bell about the technical characteristics and capabilities of the trunks and tandems.

Although at this time the parties believe a solution has been found, the parties do not know definitively whether STPCS's Nokia switch will be able to outpulse a signal configuration that can be used by the Southwestern Bell tandem. In light of the new information that the Southwestern Bell tandems cannot receive 20 digits via EMF trunk signaling, Nokia is currently evaluating the switch capabilities for SS7 trunk signaling in coordination with SCC and STPCS. Nonetheless, STPCS has revised, once again, its Phase I Exhibits (the technical forms that Southwestern Bell requires wireless carriers to submit before it will process trunk orders). These Exhibits have been sent to Southwestern Bell, which is evaluating the facilities prior to providing a new firm order commitment date. According to Southwestern Bell, it still must evaluate facilities before issuing a firm provisioning date.

PSAP Readiness. While STPCS and SCC continue to work to solve the trunk problems, they have also learned that the customer premises equipment of a number of PSAPs within STPCS's service areas is not capable of receiving 20 digits via EMF signaling. STPCS and SCC are working with the regional planning commissions and the PSAPs to identify where deployment can occur and incorporate that information into the test schedule.

STPCS and SCC have apprised TX-CSEC of these new circumstances and of the ongoing efforts to resolve them expeditiously. STPCS also has maintained contact with the necessary third parties to resolve problems as quickly as possible. Despite these diligent efforts, however, to date STPCS has been unable to implement Phase I E-911 compliance. Because these unforeseen circumstances have been beyond STPCS's control to resolve on its own, the Commission should not penalize STPCS for failure to meet the implementation deadline set forth

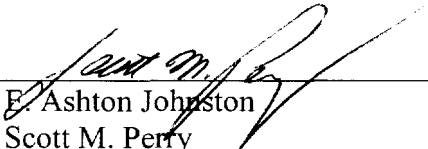
in Section 20.18(d) of the rules. As noted in the Waiver Request, notwithstanding the inability to fully implement Phase I, STPCS does forward 911 calls to local PSAPs, and indicates the cell site from which the call originates.

STPCS fully supports and is actively attempting to implement the provision of emergency services to all mobile users. STPCS is working to implement Phase I E-911 compliance as soon as technically feasible. Many of the issues discussed above are under active review, and require reliance on third parties over which STPCS has no control. STPCS pledges to continue to diligently pursue E-911 implementation, but cannot at this time provide a date certain for compliance. STPCS will continue to keep the Commission, the TX-CSEC, and other interested parties informed of the Phase I implementation status.

WHEREFORE, STPCS Joint Venture, LLC respectfully requests that the Commission grant its request for a waiver of Section 20.18(d) of the Commission's rules until such time as STPCS has implemented Phase I E-911 service.

Respectfully submitted,

STPCS JOINT VENTURE, LLC

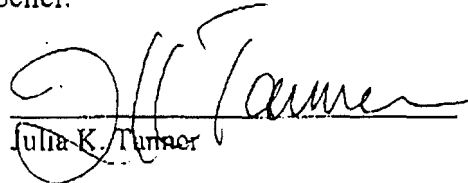
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December 15, 2000

Its Attorneys

CERTIFICATION

I, Julia K. Tanner, hereby certify that I am an authorized representative of STPCS Joint Venture, L.L.C. d/b/a SOL Communications, that I have read the foregoing Supplement to Request for Limited Waiver of Section 20.18(d) of the Commission's Rules, that I have personal knowledge of the facts set forth therein, and that the facts set forth therein are true and correct to the best of my knowledge, information and belief.


Julia K. Tanner

V.P. / General Counsel

December 15, 2000

CERTIFICATE OF SERVICE

I, Scott M. Perry, hereby certify that on this 15th day of December, 2000, I caused to be served a copy of the foregoing Supplement to Request of STPCS Joint Venture, LLC for a Limited Waiver of Section 20.18(d) of the Commission's Rules by U.S. first-class mail, or by hand delivery as indicated with an *, to the following persons:

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